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Rowland Marcus Andrade

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROWLAND MARCUS ANDRADE,

Defendant.

Case No. 20-cr-00249-RS

**DECLARATION OF JOHN M.
PIERCE**

*In Support of Defendant's Motion for
Administrative Relief*

DECLARATION OF JOHN M. PIERCE

I, John M. Pierce, declare as follows:

1. I am counsel for Defendant Rowland Marcus Andrade in the above-captioned matter. I submit this declaration in support of Defendant's Motion for Administrative Relief to Enlarge Time.

2. On September 16, 2025, Defendant filed his Motion for Bond Pending Appeal (Dkt. 742). Under Crim. L.R. 47-2(d), the Government's opposition was due September 23, 2025, and was filed that day (Dkt. 761). Defendant's reply is therefore due September 29, 2025.

3. On September 24, 2025, the Government filed its Application for Order Issuing Forfeiture Money Judgment (Dkt. 762). Under Crim. L.R. 47-2(d), Defendant's opposition is due October 1, 2025.

DECLARATION OF JOHN M. PIERCE


1 4. My firm only recently substituted in as counsel. A short extension is necessary to come
2 up to speed on the record and issues to provide effective representation.

3 5. We sought the Government's agreement to a brief extension and consolidated deadline,
4 but the Government declined to stipulate.
5

6 6. Attached as Exhibit A is a true and correct copy of my September 25, 2025 email to the
7 courtroom deputy, Ms. Hom, following up on the request for additional time and asking the
8 Court to set dates for both filings.
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10 I declare under penalty of perjury that the foregoing is true and correct.
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12 Executed on this 25th day of September, 2025, at Woodland Hills, California.
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15 John M. Pierce
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DECLARATION OF JOHN M. PIERCE